



August 5, 2024

**VIA ECF**

The Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Schansman et al. v. Sberbank of Russia PJSC et al.*, Case No. 19-cv-2985-ALC-GWG;  
VTB Bank PJSC's Letter re: Ministry of Finance of the Russian Federation

Dear Judge Gorenstein:

This firm represents defendant VTB Bank PJSC ("VTB") in the above matter. I write to update the Court on information VTB received last week from the Ministry of Finance for the Russian Federation (the "Ministry").

Unfortunately, contrary to its earlier informal indications, the Ministry rejected VTB's third, sixth and seventh requests to produce documents.

During the week of July 22, the Ministry informed VTB (also informally) that it was no longer inclined to grant these requests. We informed Plaintiffs' counsel of this on July 25, and we have agreed to a briefing schedule for their anticipated *Aerospatiale* motion which will be submitted by separate stipulation. There is no formal procedure by which VTB can challenge the Ministry's decision. Though we have not received a decision on VTB's eighth request nor on VTB's request to disclose transactional data, VTB will not argue that Plaintiffs' *Aerospatiale* motion should await those decisions. Should permission be granted with respect to such requests in the future, the parties can address the ramifications of such an event with the Court.

The Ministry did not provide any rationale for its apparent change in position. Its one-paragraph formal response only indicated that disclosure of information contained in the three requests was inappropriate.

Respectfully Submitted,

s/ Robert S. Landy  
Robert S. Landy

Cc: All Counsel of Record (via ECF)